

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

BIRKENSTOCK US BIDCO, INC.;  
BIRKENSTOCK USA, LP; BIRKENSTOCK  
IP GBMH;

Plaintiffs,

v.

WHITE MOUNTAIN INTERNATIONAL  
LLC; AMERICAN EXCHANGE TIME LLC;

Defendants.

Civil Action No. 1:24-cv-10610-PBS

JURY TRIAL DEMANDED

**MOTION FOR *PRO HAC VICE* ADMISSIONS**

Pursuant to Local Rule 83.5.3, Plaintiffs Birkenstock US BidCo, Inc.; Birkenstock USA, LP; and Birkenstock IP GmbH move that attorney Douglas A. Rettew of Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, 901 New York Avenue, N.W., Washington, DC 20001-4413, and attorney Elizabeth D. Ferrill of Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, 901 New York Avenue, N.W., Washington, DC 20001-4413 be permitted to appear *pro hac vice* (in association with the undersigned) to represent Plaintiffs in this matter.

1. In support of this motion, the Affidavit of Mr. Rettew is attached as Exhibit 1. Mr. Rettew is a Partner in the law firm of Finnegan, Henderson, Farabow, Garrett & Dunner, LLP. He is a member in good standing of the bars of the District of Columbia, the State of Maryland, and the State of New Jersey. There are no disciplinary proceedings pending against Mr. Rettew in any jurisdiction.

2. In support of this motion, the Affidavit of Ms. Ferrill is attached as Exhibit 2. Ms. Ferrill is a Partner in the law firm of Finnegan, Henderson, Farabow, Garrett & Dunner, LLP. She

is a member in good standing of the bars of the District of Columbia and the Commonwealth of Virginia. There are no disciplinary proceedings pending against Ms. Ferrill in any jurisdiction.

3. Mr. Rettew and Ms. Ferrill are familiar with the rules of this court.

4. Mr. Bell is a member in good standing of the bar of this court and will continue to represent Plaintiffs in this action.

**WHEREFORE**, Plaintiffs move this Court to admit Mr. Rettew and Ms. Ferrill *pro hac vice* for the purpose of representing them in this action.

Dated: April 23, 2024

Respectfully submitted,

/s/ Cory C. Bell  
Cory C. Bell BBO #705124  
FINNEGAN, HENDERSON, FARABOW, GARRETT  
& DUNNER, LLP  
Two Seaport Lane  
Boston, MA 02210-2001  
(617) 646-1600  
cory.bell@finnegan.com

Douglas A. Rettew (*pro hac vice* pending)  
Elizabeth D. Ferrill (*pro hac vice* pending)  
Natalie Nogueira (*pro hac vice* pending)  
FINNEGAN, HENDERSON, FARABOW, GARRETT  
& DUNNER, LLP  
901 New York Avenue, N.W.  
Washington, D.C. 20001-4413  
(202) 408-4000  
doug.rettew@finnegan.com  
elizabeth.ferrill@finnegan.com  
natalie.nogueira@finnegan.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(a)(2), the undersigned conferred with counsel for Defendants White Mountain LLC and American Exchange Time LLC and Defendants do not object to this motion.

/s/ Corey C. Bell

Corey C. Bell BBO #705124

**CERTIFICATE OF SERVICE**

I hereby certify that on Tuesday, April 23, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will simultaneously serve as notice of such filing to counsel of record to their registered electronic mail addresses.

/s/ Corey C. Bell

Corey C. Bell BBO #705124